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OCT 11 1991

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

Federal Communications Commission
Office of the Secretary

In the Matter of:

Amendment of the Table of
Frequency Allocations and
Part 22 of the Rules Relative
to the Allocation of Reserve
Spectrum for a Common Carrier
Acknowledgement Paging Service

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) ER-7997
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PETITION FOR
RULEMAKING

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October 11, 1991

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Summary

Dial Page, L.P. is petitioning for a rulemaking to allocate spectrum to Acknowledgement Paging ("AP"), a new enhanced paging service.

Dial Page proposes AP as a regional paging service which will allow the subscriber to acknowledge receipt of a paging message via the pager. This new service will enhance the efficiency of the public-switched telephone network because it would eliminate the need for subscribers to make telephone calls to acknowledge receipt of the page. Thus, AP would provide the subscriber with an enriched paging service. AP will also improve and ensure flawless service since a subscriber will be able to acknowledge and thus confirm receipt of a page.

Dial Page proposes that part of the 930-931 MHz be allocated by the Commission to this new paging service.

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PETITION FOR RULEMAKING

Dial Page, L.P. ("Dial Page"), by its attorneys and pursuant to Rule Section 1.401, petitions the Commission to allocate a portion of the reserve spectrum in the 930-931 MHz band for a common carrier Acknowledgement Paging Service ("AP"). In support, Dial Page respectfully shows the following:

I. Introduction.

1. Dial Page is a South Carolina limited partnership and a long-term Commission licensee of Public Mobile Service facilities located throughout the states of Florida, Georgia, Virginia, North Carolina, South Carolina, and Tennessee.

2. Dial Page provides paging service to approximately 180,000 subscribers throughout the southeast portion of the United States. Dial Page offers its subscribers a variety of services including tone-only, tone and voice, digital and alphanumeric paging on both a local and regional basis. Approximately 20 percent, or 36,000 of its subscribers, subscribe to one of Dial Page's regional services.

3. As a current provider of communications services, Dial Page is aware of the need to enhance and improve traditional

paging services and is committed to the facilitation and advancement of innovative technologies and systems. Through its experience and market surveys, Dial Page sees a need for advanced paging service, and has envisioned a system it believes will meet this need.^{1/} Dial Page has the technical background, the financial resources, and the practical experience to make this new service a reality. Thus, Dial Page petitions the Commission to commence rulemaking proceedings to support and promote the advanced paging technology of AP service.

II. Acknowledgement Paging Service.

4. AP is a new advanced paging service which will allow a pager user to immediately acknowledge receipt of a page.^{2/} AP insures the page sender and the pager user that a page is

^{1/} Dial Page submits that this is an instance where a carrier has determined a customer demand, and is prepared to meet that demand. The Commission should note that, generally, the equipment manufacturers originate the provision of new service rather than the carriers. Often times, certain customers' needs are overlooked because carriers have no real incentive to develop services. Manufacturers look at the development of a service on a much larger scale, and if there is a large market, have incentive to develop equipment. Carriers, on the other hand, have been restricted to evaluating needs on a smaller, more local basis. Commission action setting aside spectrum for advanced paging services, pursuant to a request from Dial Page, could be an incentive to other carriers to develop other innovative needed services.

^{2/} Attached as Exhibit 1 is Dial Page's Request for a Pioneer's Preference for the AP service which is being filed concurrently with this Petition for Rulemaking. AP is not in use anywhere in the United States or, for that matter, abroad. It is a completely new and innovative service. Dial Page submits that the Commission, by allocating frequencies for the provision of AP service would enhance the world leadership position of the United States in the paging industry.

received. The user can acknowledge a page without the need to make a telephone call. Presently, a paging subscriber carries a small unit which receives a signal of very limited duration to alert or instruct a user to do something.^{3/} The user must then find a telephone and call an office or answering service through the public switched telephone network ("PSTN") to notify the sender that a page was received. In today's world, the acknowledgement of receipt of a page requires the availability and use of a telephone. AP eliminates that need by permitting the user to acknowledge receipt of a page by either automatic trigger of a mechanism that sends a receipt message, or by touching a button on the pager to send a receipt message. If the user does not acknowledge receipt of the page, the user will be continually paged until the page is acknowledged. Thus, a user will never worry whether an expected page was missed. AP will reduce call backs, will give the user the convenience of an immediate reply, and will give the sender a positive message verification. AP, in short, ensures that a page is received. Thus, AP creates a more efficient and valuable paging service.

5. Dial Page requests that the Commission amend its Table of Frequency Allocations and Part 22 of its Rules to allocate three channels in the 930-931 MHz band for operation of AP

^{3/} Dial Page is a leading provider of alphanumeric paging service. Over 10 percent of Dial Page's customers subscribe to this service. Alphanumeric paging provides a user with a message of up to 80 characters, i.e., instructions. Thus, AP would be extremely valuable to subscribers because of the assurance to both the user and the sender that an information intensive page was received.

service.^{4/} Dial Page submits that a new frequency allocation is necessary for the implementation of AP service.^{5/} While there are paging frequencies available, there are no clear channels for a regional system. AP utilizes a separate frequency from the frequency on which a page is sent for receipt acknowledgement.^{6/} AP adds the additional feature of receipt acknowledgement to traditional paging services without making an existing service obsolete. As paging services become more complex and able to provide a user with more detailed information, AP service will be of even greater value. Dial Page believes that a rulemaking will promote advanced paging services and the immediate implementation of AP service.

6. AP service will utilize existing paging frequencies for the outgoing page and the newly allocated frequencies to acknowledge receipt of the page. AP service will employ a

^{4/} This 1 MHz band includes forty 25 MHz frequencies. Thus, three channels are 7.5 percent of the frequency band.

^{5/} Dial Page believes that use of existing allocated paging frequencies in the 35, 43, 150, 450 or 900 MHz bands, would create a delay in the provision of AP service. Dial Page recognizes that there are paging frequencies presently available throughout the country, but not on the same channel across the country. There certainly are no completely clear channels for the provision of AP on a regional basis. Rather, service would be patchworked. Moreover, if AP service utilizes a frequency that another carrier nearby uses for a different purpose, AP will likely cause interference due to the non-fixed nature of AP. Finally, manufacturers are not going to produce a product without assurance of a bulk market. A mass market simply will not happen if the manufacturers are faced with building AP pagers across the entire paging spectrum.

^{6/} AP is used in conjunction with existing paging frequencies. It does not replace them.

customized front end acknowledgement controller unit for acknowledgement service. The acknowledgement controller unit will store a page, assign an acknowledgement number to each pager, send the page to a paging terminal, poll an acknowledgement receiver for pages that are acknowledged and re-send a page if no acknowledgement is received after a preset interval. Upon receipt of acknowledgement, the controller unit can store the acknowledgement for later retrieval, or send the acknowledgement back to the original calling party or a third party via the PSTN. In addition, the front end controller can deliver an acknowledgement to other remote front ends if the customer is registered as a regional or nationwide traveler.^{7/}

7. The paging receiver and transmitter will use a standard paging receiver which includes the acknowledgement transmitter. The acknowledgement of a page can be automatic or can be activated by a button on the unit. Acknowledgements can be pre-programmed canned messages such as "pager received page" or "I received page" or "will call in one hour". These messages will be customized for each user. The paging unit itself is approximately the same size as those units manufactured today. Acknowledgement messages will be transmitted in short bursts of high speed data using a low powered transmitter built into the pager (e.g. 2 Watts). The transmitter channel bandwidth will be standard 25 KHz. The AP unit receivers will be deployed around

^{7/} Dial Page submits that a common channel for regional service would thus promote roaming.

the city with coverage of approximately 3 miles.^{8/} The receiving unit is approximately 2 feet wide and 1 foot high with a 3 foot antenna. It can be easily mounted on a tower or a side of a building. Each receiver covers approximately a 27 square mile area.^{9/}

8. Dial Page envisions AP as a regional service. While AP service could be authorized on a local basis, Dial Page believes a regional system is more functional and spectrum efficient.^{10/} As a regional service that includes local service, users that are frequently traveling can be paged anywhere with just one call.^{11/} Presently, paging carriers are experiencing increased demand for regional coverage as their subscribers are becoming more mobile. Regional paging services permit people to communicate as they travel. As stated above, 20 percent of Dial Page's subscribers (or 36,000 customers) currently subscribe to one of Dial Page's regional services. Thus, such subscribers would likely demand regional service of AP.

^{8/} Dial Page proposes to collect the information by the use of leased lines or MAS-type carriers.

^{9/} Dial Page has been assured by equipment manufacturers preliminarily that the technology necessary for AP service exists today. While there may be marginal costs associated with the equipment design and development, it is possible to manufacture the necessary equipment now.

^{10/} See supra, note 5, p. 4.

^{11/} The Commission should note that any paging carrier will be able to commission an AP licensee to provide AP service to its own subscribers.

9. Regional availability of AP service will also benefit the public interest because this service is an efficient utilization of spectrum. AP will make existing paging frequencies more valuable by providing an element of assurance to the pager user. As paging services are able to provide a user with high speed data transmissions, the service becomes more valuable.^{12/} Thus, AP provides insurance to paging users that the service actually transmits the message.

III. Public Need for Acknowledgement Paging Service.

10. There is clearly a public need for AP service. Paging is one of the most widely used land-mobile radio services. It is used widely throughout the business and consumer marketplace. Telocator recently estimated that 10 million subscribers use paging services today. In addition, Telocator stated that the paging industry has been growing at a rate of roughly 26 percent a year.^{13/}

^{12/} Where there is no assurance a user ever receives a message, the value of such service is decreased. In addition, AP is important for facilitating the locations of users. With AP, a sender could locate the user first, and then send a high capacity page once the user is located. Thus, AP will make the spectrum more efficient. Nationwide carriers might find AP particularly useful in conserving the capacity of their networks.

^{13/} See Petition for Rulemaking to Amend Part 22 of the Rules, Telocator, January 23, 1991. In 1987, a survey estimated an aggregate total of 6.5 million pagers in operation generating annual service revenues of \$2 billion. National Telecommunications and Information Administration, NTIA Telecom 2000 (Oct., 1988). Prior to 1987, the annual growth rate of paging users for four years was 15-20 percent. Projection in 1988 forecast 10 million customers by 1991 and 15 million by 1995. The 1991 estimate has been proven
(continued...)

11. While paging services are used throughout all sectors of the economy, the services industry has especially come to rely on and use paging services. The construction, transportation, and utilities sectors are also large users of paging. In addition, public health and safety personnel rely heavily on the paging service. AP can be a critical improvement in reliability for an emergency situation. In the medical field, in emergencies, a patient must call a doctor's answering service to have a doctor paged. The patient and the answering service never know whether the doctor got the page. This affects patients in potential emergency situations when they are not sure what to do. With AP, a doctor can respond immediately if he is reachable. AP eliminates the uncertainty. In addition, in a sales office when an account executive is out on call at a time when there is a customer demand, an office is able to page that salesman to respond to that demand and know whether that salesperson actually got the message. All of these conventional paging users would benefit from acknowledgement paging and are potential subscribers.

12. Through its market studies, Dial Page has determined that there is a customer demand for AP service. Dial Page engaged A.D. Little to conduct a survey in the spring of 1991 to

13/ (...continued)

correct. Thus, Dial Page submits it is reasonably likely that by 1995, there will be more than 15 million paging customers.

determine the feasibility of AP in the marketplace.^{14/} This survey included a random statistically valid sample of 200 Dial Page pager users and 1,000 non-users. The survey indicated that depending upon the cost to the subscriber, at \$10 to \$20, the penetration potential among existing subscribers was between 24 percent and 34 percent, i.e., at \$10 the potential penetration was 34 percent; at \$20 the potential penetration was 24 percent. Thus, Dial Page estimates that out of its base of 180,000 current subscribers, 43,000 will subscribe to AP service. The survey of non-users also predicted that overall paging penetration would increase by 15 percent. Combining current paging users with new users, the study predicts that 4 million customers would use AP on a national basis. Thus, Dial Page submits that there is a mass market with various applications of use (rather than a niche market) for AP service, and the Commission should allocate new spectrum to utilize AP service and improve traditional paging services^{15/}.

IV. Spectrum Allocation.

A. Spectrum.

13. In 1982, the Commission reserved 1 MHz in the 930-931 MHz band for potential future use by advanced technology

^{14/} The survey specifically asked customers whether they were interested in a service such as AP.

^{15/} Once constructed, there are a number of additional uses that AP would be able to serve. For example, AP would have the ability to be used for telemetry services for status reporting, and for personal locating devices.

paging systems.^{16/} Dial Page submits that AP service is exactly the kind of advanced service the Commission reserved for use on this frequency.

14. Dial Page proposes that 3 channels of the 40 channels in 1 MHz of spectrum between 930-931 MHz be allocated to AP service.^{17/} From its market research, Dial Page believes that 3 channels will meet the customer demand for AP service. Dial Page submits a 25 KHz channel spacing would be appropriate. Allocation of this spectrum to AP will make all traditional paging frequencies more efficient because of the insurance value provided to paging service by AP. Thus, the value of the existing paging spectrum would be enhanced.

B. Geographic Scope.

15. As described above, while AP could be provided on a strictly local basis, Dial Page proposes AP as a regional system. Existing paging subscribers, as explained above, are demanding regional coverage. Indeed, many current paging licensees provide multistate coverage. Dial Page submits that subscribers will demand at least the same coverage as is available for traditional paging systems.^{18/}

^{16/} Amendment of Parts 2 and 22 of the Commission's Rules to Allocate Spectrum in the 928-941 MHz Band and to Establish other Rules, Policies and Procedures for One-Way Paging Stations in the Domestic Public Land Mobile Radio Service, 89 F.C.C. 2d 1137 (1982) ("1982 Order").

^{17/} See supra, note 2, p. 2.

^{18/} Dial Page itself already provides traditional paging services to four distinct region-wide systems. Twenty
(continued...)

16. In addition, AP service on a local basis, is not the most functional or efficient use of spectrum. Dial Page envisions AP as an enhancement to traditional paging services. AP utilizes a separate frequency to acknowledge a page and a traditional paging frequency to receive a page. Thus, carriers can continue operating on paging frequencies and add the feature of receipt acknowledgement to its service. If the Commission licenses AP by locality, system development would be much slower due to the need for intercarrier agreements. In addition, carriers would be subject to the full panoply of state regulation which would also likely delay development of a regional system. Accordingly, AP should be licensed on a regional basis to maximize use of the advanced AP service and the new spectrum allocation.

17. A regional AP system would enable a subscriber to receive a page and acknowledge a page when outside of its local service area. Many potential users will travel within one geographic region. It is Dial Page's experience, supported by a market study of a broad cross section of 1000 businesses, that in excess of 80 percent of those businesses have employees that

^{18/}(...continued)

percent of Dial Page's subscriber base subscribe to one of its region-wide systems.

travel no more than 300 miles away from the home office.^{19/} Thus, many businesses will benefit from a regional service.

18. In addition, regional service furthers the public interest because it will likely result in lower prices for the production of equipment and the provision of service due to economies of scale.^{20/} Equipment manufacturers respond to planned technological development. Should the Commission allocate spectrum for a specific purpose, such action will encourage manufacturers to respond with technological innovation rather than waiting for spectrum development. Without spectrum allocation, technological innovation is retarded.

19. Accordingly, Dial Page proposes three geographic regions in the United States similar to that proposed by PacTel Paging in its August 2, 1991 petition for rulemaking:^{21/} a Pacific Region, a Midwest Region, and an Atlantic Region. The Pacific Region would include all states wholly within the

^{19/} As stated in note 7, p. 6, there are no clear channels for regional service in the frequencies currently allocated for paging. Thus, service would not be on a regional basis, but rather patchworked. Moreover, AP would likely cause interference to other nearby carriers operating a different service on the same frequency.

^{20/} AP will employ multiple small self contained receiver units and antennas.

^{21/} Amendment of Table of Frequency Allocations, PacTel Paging, August 2, 1991. Dial Page, however, will support any regional geographical division the Commission decides is appropriate.

Pacific, Alaska, Standard (Hawaii), and Mountain Time zones.^{22/}
The Atlantic Region would include all states wholly within the Eastern Standard time zone, except Michigan, Indiana, and Ohio.^{23/} The Midwest Region would include all other states.^{24/}

20. By allocating three regions, the Commission can permit the licensee to construct facilities within a region without the need of additional authorization, other than notification of construction of facilities. This procedure is consistent with the Commission's handling of air-ground nationwide service. This is especially important because of the need for multiple receiver units in one city alone.

C. Technical Requirements.

21. Dial Page proposes that AP service be regulated under Part 22 of the Commission's Rules. These Rules, however, may need to be modified to support AP. For instance, there may be

^{22/} These states include Hawaii, Alaska, Washington, Oregon, California, Idaho, Nevada, Utah, Arizona, Montana, Wyoming, Colorado, and New Mexico.

^{23/} These states include Maine, New Hampshire, Vermont, Massachusetts, New York, Connecticut, Rhode Island, New Jersey, Pennsylvania, Maryland, Delaware, District of Columbia, West Virginia, Virginia, North Carolina, South Carolina, Georgia, and Florida.

^{24/} These states include North Dakota, South Dakota, Nebraska, Kansas, Oklahoma, Texas, Minnesota, Iowa, Missouri, Arkansas, Louisiana, Wisconsin, Illinois, Michigan, Indiana, Ohio, Kentucky, Tennessee, Mississippi, and Alabama.

provisions necessary to accommodate the unique regional nature of AP, such as fleet licensing.^{25/}

D. Commitment to Construct.

22. The Commission should adopt standards for a schedule of construction to ensure against speculation, i.e., required to construct receiver system to cover 10 of the top 20 MSAs in 3 years. Since only three licenses will be awarded in each region, such a schedule will ensure that the systems will be constructed.

V. Licensing Standards.

23. Licensees for AP should be regarded as non-dominant carriers. In addition, licensees must meet the Commission's basic qualifying standards. An AP applicant must be (1) legally, (2) financially, and (3) technically qualified to be a Commission licensee. Finally, the Commission should use random selection to award the licensees.

A. Regulatory Status.

24. AP should be regulated as a non-dominant common carrier service. Dial Page proposes that three carriers be licensed per region to facilitate competition. With three carriers in a region, no one carrier will have significant market power. In addition, an AP licensee will be able to provide AP service to other traditional paging companies since the subscriber units would receive pages on a traditional frequency and transmit on a

^{25/} Dial Page is willing to submit reports of its performance and market acceptance for the Commission to evaluate AP service and the technical requirements under Part 22 of its rules. Thus, should any standards need to be modified, it could be done on an informed basis.

separate frequency. In addition, licensees are required to offer service to all prospective subscribers on a non-discriminatory basis.

25. The Commission should retain exclusive jurisdiction over AP service because it is interstate in nature. Without federal preemption, AP service will be subject to a variety of state regulations on technical aspects of the service, as well as state entry and exit regulations, which could jeopardize the regional nature of the AP service. Dial Page does, however, fully recognize the need and supports state regulation of local service.

B. Legal Qualifications.

26. Dial Page proposes that the eligibility criteria of Part 22.4 of the Rules govern the legal qualifications for AP licenses.

C. Financial Qualifications.

27. Applicants must demonstrate that they have the financial ability to construct and operate a regional system. A firm financial commitment should be required for each license.^{26/} Requiring a firm financial commitment at the time the application is filed will help reduce speculative applications. While it is the Commission's policy to encourage legitimate applicants, such a requirement will ensure that only bona fide applicants file applications. In addition, this stricter requirement will make an applicant assess the economic viability of the AP system

^{26/} See, e.g., Section 22.917.

prior to filing for a license. Moreover, since only three licenses will be awarded in each region, an applicant must be able to demonstrate the ability to construct a regional system to ensure that this service is provided to the public. For the above reasons, Dial Page recommends that applicants for AP licenses be required to document the costs of construction and operation of the proposed facilities on a regional basis for the first three years,^{27/} together with other initial expenses and demonstrate a firm financial commitment to meet those costs.

D. Technical Qualifications.

28. Applicants must demonstrate their qualifications to operate AP service. This demonstration should include a history of the applicant's experience constructing and operating a conventional paging system, and the applicant's experience in telecommunications. In addition, an applicant must provide a complete technical description of its proposed system.

E. Licensee Selection Method.

29. Dial Page proposes assignment by lottery. AP appears to be an appropriate service for the use of a lottery for selecting initial licensees because the number of interested providers of service will likely exceed the number of available channels. This process would serve the public interest by expediting the provision of AP service to the public. The Commission must, however, adopt rules and procedures that will

^{27/} This 3 year financial commitment corresponds with the commitment to construct and cover 10 of the top 20 MSAs within a region in 3 years.

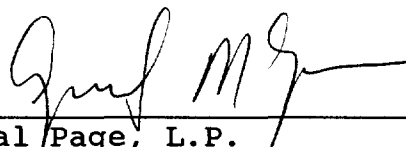
reduce speculation for these licenses. Dial Page recommends that applicants be pre-screened to ensure that they meet basic qualifying criteria. In addition, an applicant should be allowed to submit only one application per region. Finally, once the initial license is awarded, it should not be transferable for at least one year with a requirement that part of the system be already constructed.^{28/}

VI. Conclusion.

30. Dial Page respectfully petitions the Commission to initiate a rulemaking proceeding to allocate spectrum and adopt rules for Acknowledgement Paging as set forth above. By separate filing, Dial Page is requesting a Pioneer's Preference with respect to this new service.

Respectfully submitted,

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October 11, 1991

^{28/} Dial Page acknowledges that transferability is important in terms of attracting capital which, in turn, promotes innovation by facilitating the development of new technology such as AP.

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REQUEST FOR PIONEER'S PREFERENCE

Dial Page, L.P. ("Dial Page"), by its attorneys and pursuant to Rule Section 1.402, requests a Pioneer's Preference in connection with its Petition for Rulemaking ("Petition") for the allocation of a portion of the reserve spectrum in the 930-931 MHz band for a common carrier Acknowledgement Paging Service ("AP"). Dial Page is filing concurrently herewith an application for an experimental license for AP service. In support of this request, Dial Page respectfully shows the following:

I. Introduction.

1. Dial Page is a South Carolina limited partnership and a long-term Commission licensee of Public Mobile Service facilities located throughout the states of Florida, Georgia, Virginia, North Carolina, South Carolina, and Tennessee.

2. Dial Page provides paging service to approximately 180,000 subscribers through the southeast portion of the United

States. Dial Page offers its subscribers a variety of paging services on a local and regional basis.

3. As a provider of communication services, Dial Page is in a good position to assess and meet the needs of its paging subscribers. Dial Page submits that AP is a new service that will greatly enhance traditional paging services. Dial Page has the technical background, the financial resources, and the practical experience to develop and implement AP service.

II. Eligibility Requirements for a Pioneer's Preference.

4. Section 1.402 of the Commission's Rules, 47 C.F.R. 1.402, sets forth the eligibility requirements for a pioneer's preference:

- (1) the applicant must request an allocation of spectrum for the new service or for the service that will substantially enhance an existing service;
- (2) the preference request must contain information regarding the frequencies it proposes to use, the geographic area, and how existing licensing should or should not apply;
- (3) the applicant must demonstrate that it has developed the new service or technology, has brought out the capabilities or possibilities of the technology or service, or has brought them a more advanced or effective state; and

(4) the applicant must demonstrate the technical feasibility of the proposal.

A. Concurrent Request for Allocation of Spectrum.

5. An entity that seeks a Pioneer's Preference must also file a request for an allocation of spectrum for its proposed service. Concurrent with this request for a Pioneer's Preference, Dial Page has filed a Petition for Rulemaking requesting allocation of spectrum for Acknowledgement Paging. In its Petition, Dial Page proposes that three channels in 1 MHz of spectrum between 930-931 MHz be allocated to AP service. Dial Page submits that this band was reserved by the Commission for this use - to facilitate and promote advanced technology paging systems.

B. Acknowledgement Paging Service.

6. The Commission, at its discretion, grants a Pioneer's Preference to an entity that demonstrates that it has developed an innovative proposal that leads to the establishment of a new service or enhances an existing service. AP is a new advanced paging service that also enhances existing paging services.

7. AP allows a pager user to immediately acknowledge receipt of a page without the need to make a telephone call. AP service will permit the user to acknowledge receipt of a page by either the touch of a button on the unit or by an automatic mechanism in the unit that sends a message of receipt. If a user does not acknowledge receipt of a page, the user will be continually paged. Thus, AP reduces call backs, allows the user

to reply immediately, and gives the sender verification that the page was received. A detailed description of Dial Page's proposed AP service is contained in the Petition for Rulemaking filed simultaneously herewith and Exhibit 2 attached hereto illustrates how AP will function. AP is a brand new innovative service not in use anywhere in the United States nor to Dial Page's knowledge, in the world.

8. AP enhances traditional paging services. The AP service will utilize existing paging frequencies for the outgoing page and the new frequency for the receipt acknowledgement. Thus, AP is used in conjunction with existing paging service. It does not make any paging service obsolete. Rather, AP makes traditional paging services more valuable by adding a measure of insurance that a page was actually received. As traditional paging services are becoming more complex by providing a user with more detailed information transmissions, AP will become more important to assure a user that the message was actually transmitted. Thus, AP enhances existing paging services.

C. Spectrum Allocation

9. Dial Page proposes that three channels of the 40 channels in 1 MHz of spectrum between 930-931 MHz be allocated to AP service. Dial Page submits that AP service is a service for which the Commission specifically reserved this spectrum.^{1/}

^{1/} Amendment of Parts 2 and 22 of the Commission's Rules to Allocate Spectrum in the 928-941 MHz Band and to establish
(continued...)

D. Technical Feasibility.

10. The provision of AP service is technically feasible. Dial Page has preliminarily submitted its proposal to equipment manufacturers. The equipment manufacturers have assured Dial Page that the technology necessary for AP service exists today. While there may be marginal costs associated with the equipment design and development, it is possible to manufacture the equipment now.

11. AP service will utilize existing paging frequencies for the outgoing page and the newly allocated frequencies to acknowledge receipt of the page. The paging unit will be approximately the same size as those units manufactured today. Acknowledgement messages will be transmitted in short bursts of high speed data using low-powered transmitters built into the pager (e.g. 2 Watts). The transmitter channel bandwidth will be standard 25 KHz. AP service receiving unity will be deployed in a three mile radius, each covering a 25 square mile area.

E. Geographic Area.

12. Dial Page proposes that AP be licensed as a regional service. As a regional service, subscribers can be paged as they travel from one service area to another with just one call. There is a growing demand for regional service as evidenced by a market study conducted by Dial Page. The study concluded that

¹/ (...continued)

other Rules, Policies, and Procedures for One-Way Paging Status in the Domestic Public Land Mobile Radio Service, 89 F.C.C. 2d 1337 (1982).